REMARKS/ARGUMENTS

The Office Action of June 3, 2005, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 2-18 and 21 remain pending. Claims 1, 19 and 20 have been canceled without prejudice or disclaimer. Applicants have included a copy of the pending claims as a courtesy to the Examiner for review of the present response.

Applicants have amended the Abstract at the request of the Examiner to ensure the Abstract does not exceed 150 words. The amendment to the Abstract does not add new matter.

Claims 2-5, 9-18, and 21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,139 to Smith, III et al. (hereinafter referred to as "Smith"). Applicants respectfully traverse this rejection. The Action alleges that Smith shows all the elements of claims 2-5, 9-18, and 21.

Applicants' claim 21 recites, among other features, "at least two of the document pages including links, one of the links having a property that indicates a display format for the link." To show this feature, the Action relies on col. 3, lines 36-39 and col. 4, lines 9-20 of Smith. Contrary to the Action's assertion however, Smith neither teaches nor suggests this feature. Included below are col. 3, lines 31-38 and col. 4, lines 9-20 as relied upon in the Action.

> A second shortcoming of HTML and Web browsers is that there is no standard mechanism for specifying link properties *such as educational level, type of resource, information source, or the like,* which could be supported by Web browsers to give the user finer control of link display based on link properties. After the links are typed in, they must be maintained as their URLs change, and as new and better link-targets become available...
>
> The hyperlink databases of the present invention support various optional "properties" associated with each hyperlink. One such property, useful in the development educational content, is a level designation which indicates the educational level required for best understanding of the link-target information. Additional optional properties include the language of the content (such as English), a viewer suitability rating such as exists for movies (PG-13, R, etc.), and properties defined by the user. Link properties can be specified by users to control the automatic installation of links, and/or to control what is displayed while browsing the link databases. (emphasis added)

Neither the specified portions nor any other portion of Smith teach or suggest a property that indicates a display format for the link. As shown above in the cited portions, Smith describes link properties "such as educational level, type of resource, information source, or the like." These types of properties have no relation to a display format. For example, Smith describes a property for identifying a suitable education level needed to understand a linked target, a viewer suitability rating based upon age, and user defined properties. None of these types or any other types of properties in Smith describes or suggests a display format for a link.

Still further, Applicants' claim 21 recites, among other features, "wherein the link relates a spot in a document page with an executable object." As describing this feature, the Action cites col. 5, lines 27-34 of Smith, relying on the ability to navigate to a target web page when clicking on a link. However, the Summary section of Applicants' original written description describes the difference between an executable object and navigation. Specifically, page 3, lines 10-14 states:

> A link can relate a spot or region in a document with a spot or region in another document, so that touching the link causes the display to navigate to that other document. A link can also relate a spot or region in a document and an active runable object such that when a user activates that link or touches that spot in the document, the associated object is run. (emphasis added)

Smith describes a link that navigates to another web page. Smith fails to teach or suggest Applicants' feature, "wherein the link relates a spot in a document page with an executable object." Thus, claim 21 is patentably distinguishable from Smith for at least the above stated reasons. As such, withdrawal of the rejection is respectfully requested.

To show the claim 2 feature, "wherein the display format of the link is based upon an examination of the content of a target document associated with the link," the Action relies on the same support for rejecting claim 21 and points to col. 9, lines 1-12 of Smith. Inspection of the cited passage reveals nothing remotely related to a display format of a link being based upon an examination of the content of a target document associated with the link. At best, the cited portion of Smith describes how links or context subtrees may be marked for inclusion/exclusion in automatic link installations, means for navigating to contexts, and displaying links based upon link subsets, such as all links entered by a user. The cited portion fails to teach or suggest that

the display format is based upon an examination of the content of a target document associated with the link. Thus, Smith is wholly devoid of a teaching or suggestion of the claim 2 combination of features. Applicants' claim 2 is patentably distinct over Smith for similar reasons as described above with reference to Applicants' claim 21 and further in view of the additional reasons herein.

To show the claim 3 feature that the link has a property indicating the display update latency of the link, the Action relies on the same support for rejecting claim 21 and points to col. 27, lines 32-42 of Smith. Inspection of the cited passage reveals nothing remotely related to a link having a property indicating the display update latency of the link. Thus, Smith is wholly devoid of a teaching or suggestion of the claim 3 combination of features. Applicants' claim 3 is patentably distinct over Smith for similar reasons as described above with reference to Applicants' claim 21 and further in view of the additional reasons herein.

Applicants' claim 4 recites, among other features,

> in response to activation of a second link by a user, the second link being different than the first link and linking to the same document page linked to by the first link, navigating to the linked-to document page and displaying the document page in a second display format, the second display format being different than the first display format.

To show this feature, the Action relies on col. 3, lines 18-27 and col. 4, lines 9-20 of Smith. Contrary to the Action's assertion however, Smith neither teaches nor suggests these features.

At best, Smith describes how a link-target URL may point to another Web page or it may simply point to another location within the same electronic document. Smith describes the general navigation among various pages of an electronic document; however, the cited portion, nor any other portion of Smith, teaches or suggest the same document page. Claim 4 recites linking to the same document page and displaying the document page in a second display format. Smith fails to teach or suggest two links to the same document page. As such, for at least the above-stated reasons, withdrawal of the rejection is respectfully requested.

Applicants' claim 5 recites, among other features, "indicating via at least one link property a display format for at least one of the first and second links." Applicants' claim 5 includes similar features described above with reference to Applicants' claim 21. Therefore, for

similar features recited above with respect to Applicants' claim 21, claim 5 is patentably distinct over the art of record for substantially the same reasons and further in view of the novel features recited therein.

Applicants' claims 9-18, which depend from claim 5, are patentably distinct over the art of record for at least the same reasons as their base claim and further in view of the novel features recited therein.

Claims 6-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Smith in view of U.S. Patent No. 6,151,622 to Fraenkel et al. (hereinafter referred to as "Fraenkel"). Applicants respectfully traverse this rejection.

Fraenkel fails to overcome the deficiencies noted above with respect to claim 5. As such, Applicants' claims 6-8 are patentably distinct over the art of record for at least the same reasons as their ultimate base claim ad further in view of the novel features recited therein. For example, Applicants have inspected the cited passage of Fraenkel applied to show the added feature recited in claim 6 of "displaying, in a display frame associated with a link in a linked-from document page, information about a linked–to document page." The cited portion describes a browser window 200 sub-divided into three frames 201-203 associated with different URLs, where clicking on a link in one frame has no affect on the other two frames. (Fraenkel, col. 3, lines 48-63 and Fig. 2). For this further reason, even assuming, but not admitting, that the combination of Smith and Fraenkel is proper, the combination does not result in the claim 6 invention.

CONCLUSION

A fee transmittal is attached. If any additional fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,
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